

1 FELIX S. LEE (CSB No. 197084)  
flee@fenwick.com  
2 CHRISTOPHER J. STESKAL (CSB No. 212297)  
csteskal@fenwick.com  
3 CASEY O'NEILL (CSB No. 264406)  
coneill@fenwick.com  
4 CLAIRE MENA (CSB No. 339324)  
cmena@fenwick.com  
5 FENWICK & WEST LLP  
Silicon Valley Center  
6 801 California Street  
Mountain View, CA 94041  
7 Telephone: 650.988.8500  
Facsimile: 650.938.5200

JOHN D. TENNERT III (Nevada Bar No. 11728)

9 jtennifer@fennemorelaw.com

## WADE BEAVERS (Nevada Bar)

10 wbeavers@fennemorelaw.com

FENNEMORE CRAIG, P.

11 | 7800 Rancharrah Parkway

Reno, NV 89511  
T-1-1-555-500-2212

Telephone: 775.788.2212  
E-mail: 775.786.1172

Facsimile: 775.786.1172

Attn: Counsel for Plaintiff

14 Attorneys for Plaintiff  
TETSUYA NAKAMURA

14 TEISUYA NAKAMURA

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TETSUYA NAKAMURA,

Plaintiff,

V.

SUNDAY GROUP INCORPORATED, *et al.*,

## Defendants.

23 SUNDAY GROUP INCORPORATED AND  
TOSHIKI (TODD) MITSUISHI

<sup>24</sup> Counterclaimants.

23 || v.

20      ~~THE PRACTICAL USE OF THE BIBLE~~,

Case No.: 2:22-cv-01324-MMD-EJY

DECLARATION OF FELIX S. LEE IN  
SUPPORT OF REPLY MEMORANDUM IN  
SUPPORT OF MOTION TO DISMISS  
COUNTERCLAIMANTS' AMENDED  
COUNTERCLAIMS

1 I, Felix S. Lee, hereby declare:

2 1. I am an attorney admitted *pro hac vice* to practice before this Court and a partner  
3 at the law firm of Fenwick & West LLP, which represents Dr. Tetsuya Nakamura, the plaintiff  
4 and counterdefendant in this action. I have personal knowledge of the matters set forth in this  
5 declaration and, if called upon to do so, could and would testify competently as to the matters  
6 described below.

7 2. Attached hereto as **Exhibit A** is the First Amended Complaint in *Local Ad Link,*  
8 *Inc. v. AdzZoo, LLC*, Case No. 2:09-cv-01564-RCJ-LRL, in the United States District Court for  
9 the District of Nevada (ECF No. 21-2). Exhibit A was the operative complaint before the Court  
10 in the decision *Local Ad Link, Inc. v. AdzZoo, LLC*, 2009 WL 10694069 (D. Nev. Dec. 15, 2009),  
11 a decision cited by the parties to this case.

12  
13 I declare under penalty of perjury under the laws of the United States of America that the  
14 foregoing is true and correct.

15  
16 Executed this 12th day of January 2024

17  
18 By: /s/ Felix S. Lee  
Felix S. Lee